ELLIOTT & ELLIOTT, P.A.

ATTORNEYS AT LAW

721 OLIVE STREET
COLUMBIA, SOUTH CAROLINA 29205
selliott@elliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555 FACSIMILE (803) 771-8010

October 15, 2009

VIA ELECTRONIC FILING

Mr. Charles L.A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Drive Columbia, South Carolina 29210

RE: State Universal Support of Basic Local Service Included in a Bundled Service

Offering or Contract Offering Docket No. 2009-326-C

Dear Mr. Terreni:

Enclosed please find the Second Set of Discovery Requests to South Carolina Cable Television Association, CompSouth, tw telecom of south Carolina, llc and Nuvox Communications, Incorporated filed on behalf of United Telephone Company of the Carolinas, LLC d/b/a CenturyLink in the above referenced docket. By copy of this letter, I am serving all parties of record.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott

SE/jcl

cc: All Parties of Record w/enc.

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2009:326-C

IN RE:) UNITED TELEPHONE COMPANY
) OF THE CAROLINAS, LLC d/b/a
State Universal Service Support of Basic) CENTURYLINK'S SECOND SET
Local Service Included in a Bundled) OF INTERROGATORIES AND
Service Offering or Contract Offering) REQUEST FOR PRODUCTION TO
) THE SOUTH CAROLINA CABLE
) TELEVISION ASSOCIATION,
) COMPSOUTH, tw telecom of south
) Carolina Ilc, AND NUVOX
) COMMUNICATIONS
) INCORPORATED

TO: FRANK ELLERBE AND BONNIE SHEALY, COUNSEL FOR SOUTH CAROLINA CABLE TELEVISION ASSOCIATION, COMPSOUTH AND tw telecom of south carolina llc

JOHN J. PRINGLE, JR.
COUNSEL FOR NUVOX COMMUNICATIONS INCORPORATED

In accordance with 26 S.C. Regs 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), United Telephone Company of the Carolinas, LLC d/b/a CenturyLink ("CenturyLink") requests that the South Carolina Cable Television Association, CompSouth, tw telecom of south carolina Ilc, and Nuvox Communications Incorporated (collectively, "CLECs") respond to the following interrogatories and/or requests for production within twenty days of service.

No. 2-1

For each entity listed in the introductory paragraph to these Requests, or for any member of an entity that is an association, that you have identified as providing "communications services" in CenturyLink's service territory in response to CenturyLink's First Request No. 1-6, please identify by entity, or member of any entity that is an association, and for each exchange: 1) whether the communications services provided are telephone service, voice over internet protocol service or similar voice or voice replacement service, data service, video service or any information service; and 2) the number of customers who subscribe to each type of communications service.

Date this 15th day of October 2009.

Scott Elliott, Esquire Elliott & Elliott, P.A.

721 Olive Street

Columbia, SC 29205

803-771-0555 (phone)

803-771-8010 (fax)

selliott@elliottlaw.us

Susan S. Masterton, Esquire

CenturyLink

1313 Blair Stone Road Tallahassee, FL 32301

850-599-1560 (phone)

850-878-0777 (fax)

susan.masterton@embarq.com

Attorneys for United Telephone Company of the Carolinas d/b/a CenturyLink

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

State Universal Service Support of Basic Local Service Included in a Bundler Service Offering or Contract Offering

DOCKET NO .:

2009-326-C

PARTIES SERVED:

John M.S. Hoefer, Esquire	M. John Bowen, Jr., Esquire
Benjamin P. Mustain, Esquire	Margaret M. Fox, Esquire
Willoughby & Hoefer, P.A.	McNair Law Firm. P.A.
P. O. Box 8416	P. O. Box 11390
Columbia, SC 29202	Columbia, SC 29211
John J. Pringle, Jr., Esquire	Burnet R. Maybank, III, Esq.
Ellis, Lawhorne & Sims	Nexsen Pruet, LLC
P. O. Box 2285	1230 Main Street, Suite 700
Columbia, SC 29202	Columbia, SC 29202
William R. Atkinson, Esq.	Susan S. Masterton, Esquire
Sprint Nextel	CenturyLink
233 Peachtree St., Suite 2200	1313 Blair Stone Road
Atlanta, GA 30303	Tallahassee, FL 32301
Frank R. Ellerbe, III, Esquire	Stan Bugner
Bonnie D. Shealy, Esquire	Verizon South, Inc.
Robinson, McFadden & Moore	1301 Gervais Street, Ste. 825
P. O. Box 944	Columbia, SC 29201
Columbia, SC 29202	SeeV/
Steven W. Hamm, Esquire	Nanette S. Edwards, Esquire
Richardson Plowden Carpenter &	Office of Regulatory Staff
Robinson, PA	P. O. Box 11263
P. O. Box 7788	Columbia, SC 29211
Columbia, SC 29202	Section (Control of Control of Co
Patrick W. Turner	
BellSouth Telecommunications,	
Inc.	
1600 William Street, Ste. 5200	
Columbia, SC 29201	

PLEADING:

United Telephone Company of the Carolinas, LLC d/b/a CenturyLink Second Set of Interrogatories and Request for Production

October 15, 2009

Jackie C. Livingston, Paralegal